CITY OF TORONTO
PLANNING AND DEVELOPMENT DEPARTMENT

L.29

METROPOLITAN TORONTO LIBRARY Municipal Reference

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C&N/East
January 16, 1985

To: Land Use Committee

Subject: Response to public submissions on the recommendations of the Interdepartmental Task Force on Affordable Housing.

Origin: Land Use Committee meeting of 12 December 1984. (c71luc85038:126)

Comments:

1. INTRODUCTION

On 12 December 1984 your Committee considered my report (1 November 1984) providing further clarification of the recommendations of the Interdepartmental Task Force on Affordable Housing, together with the City Solicitor's report (5 October 1984) on draft by-laws to effect the recommendations of the Task Force. Your Committee deferred any decision on my report and that of the City Solicitor, requesting instead that different City officials and the Zoning By-law Task Force report on 30 January 1985 to your Committee on various related matters. In particular, your Committee requested that I coordinate a response by all relevant Departments to the submissions on this subject, paying special attention to issues respecting sanitary facilities, minimum room sizes and new Ontario Building Code regulations.

This report summarizes the concerns raised by the public submissions on the Affordable Housing Task Force recommendations and responds to the major issues so identified. While some residents are apprehensive about aspects of the Task Force's work, there is little empirical evidence that would substantiate their fears. This report concludes that the provision of sanitary facilities is best strengthened through changes to the Housing By-law and that the Ontario Building Code (O.B.C.) room size regulations applying to new construction are adequate for conversions and renovations as well. Since Part 11 of the O.B.C. has the effect of removing minimum space requirements for renovated buildings, I am now recommending that the Part 9 requirements that apply to new construction also apply to converted buildings in the City of Toronto and that these be introduced into the Zoning By-law. Finally, I have not been able to discover any characteristics of North Parkdale that distinguish it from other Toronto neighbourhoods for the purposes of the Affordable Housing recommendations, and I am therefore recommending that it not be treated differently.

2. SUMMARY OF SUBMISSIONS

On 12 December 1984, thirteen deputants appeared before your Committee. Six deputants expressed general support for the Affordable Housing Task Force recommendations, four were opposed and three expressed qualified support. The individuals and groups represented are as follows:

- Ms. Judy Hutter and Ms. Barb Millar, Roncesvalles Macdonell Residents' Association - opposed;
- Ms. Sylvia Davis, Manager, Housing Conservation Unit, Ministry of Municipal Affairs and Housing - in support;
- Mr. Doug Harink, Danforth Ecuhomes - in support;
- Mr. Larry Morris, Toronto Christian Resource Centre - qualified support;
- Mr. Mike Meraw, Rumours Newsletter - qualified support;
- Mr. Bill Bosworth, Homes First Society - in support;
- Mr. William Roberts, Confederation of Resident and Ratepayer's Association - opposed;
- Mr. John W. Bryan, Executive Officer, Toronto Redevelopment Advisory Council - in support;
- Ms. Barbara Taylor, Federation of Metro Tenants' Association - in support;
- Mr. Justin Lewis, Rumours Newsletter - qualified support;
- Ms. Pat Capponi, 57 Wilson Park Road - opposed;
- Mr. Ross Bobak, 46 Springhurst Avenue - opposed;
- Mr. Julius Hesselman, Toronto Guest Home Association - in support.

A number of groups and individuals made written submissions to your Committee, but did not appear in person. Of the following groups, four support the Task Force recommendations, five are opposed and 4 indicate neither support nor opposition:

- Mike Cassels, Rathnelly Residents' Association - opposed;
- David R. Street, Annex Residents Association - no stated position;

- J. H. Harvey, ABC Residents' Association - no stated position,
- Michael A. Mackenzie, Lyndhurst Lodge Townhomes Owners' Association - opposed;
- Michael A. Galway, Canadian Insititute of Public Real Estate Companies - no stated position;
- Secretary, Board of Health - in support;
- Ivy St. Lawrence, Mayor's Committee on Aging - in support;
- Kenn Richard, East Toronto Housing Issues Committee - in support,
- Marshall S. Kramer, The South Rosedale Ratepayers' Association - opposed;
- G. V. Forster, The North Rosedale Ratepayers' Association - opposed;
- Lois Becker and David Kidd, Central Neighbourhood House - in support;
- Hugh Wilkinson, Summerhill Residents' Association - no stated position;
- Muriel Casey, Swansea Area Ratepayers' Association - opposed.

It should be noted that the five residents' groups that have indicated opposition to the Affordable Housing Task Force recommendations will not be directly affected by the proposed legislation or will only be affected marginally. For the most part, their neighbourhoods are zoned to exclude the type of accommodation being promoted by the Task Force. The remainder of this report will respond to the issues raised by your Committee and by the abovementioned groups and individuals.

3. PROVISION OF SANITARY FACILITIES

Currently, the Housing By-law (No. 73-68 as amended) requires that all dwellings have toilets in a ratio of one for each 10 or fewer occupants and have at least one bath-tub or shower accessible to all occupants of every dwelling unit. The Zoning By-law does not contain any sanitary facility requirements except for dwelling houses converted to boarding or lodging houses or converted dwelling and lodging houses. For these two uses only, the By-law requires the provision of toilets, wash basis and baths or showers on the basis of one each for every six occupants.

The Affordable Housing Task Force, upon the suggestion of the Commissioner of Buildings and Inspections, is recommending that the Zoning By-law requirements respecting sanitary facilities be deleted. This decision was made entirely on practical grounds: the Commissioner has stated that zoning requirements based on occupancy are unenforceable. These provisions and others dealing with maintenance and upkeep are better regulated and enforced through the Housing By-law. Their inclusion in the Zoning By-law has no practical effect other than adding complexity and confusion to an already rather convoluted set of regulations.

The public has raised concerns that the deletion of the sanitary facilities requirements in the Zoning By-law represents a lowering of standards for rooming house style accommodation. This is not the case because, for all intents and purposes, the present zoning regulations can not be enforced. If the City feels that the provision of sanitary facilities should be strengthened, then I suggest that this should be done through amendments to the Housing By-law. I should point out, however, that changes to the present requirements of the Housing By-law will apply to all housing types, not just converted houseform buildings.

4. MINIMUM SPACE REQUIREMENTS

As a condition of converting a dwelling house to more intensive residential use, the Zoning By-law currently contains certain floor area requirements for rooms and units so created. Other than a maximum size requirement for senior citizens housing, no other type of housing is regulated by the Zoning By-law with respect to floor area. Until recently, however, the Ontario Building Code (O.B.C.) stipulated minimum dimensions and floor areas for all residential uses. In addition, the Housing By-law contains provisions aimed at preventing overcrowding, which are based on occupancy and floor area, that apply to all dwellings.

The Affordable Housing Task Force is recommending that the minimum floor area requirements of the Zoning By-law be deleted for three reasons. First, from an administrative viewpoint, these matters are more appropriately dealt with in the O.B.C. and Housing By-law. Having a parallel set of standards in the Zoning By-law may be both confusing and redundant. Second, from a viewpoint of establishing equitable standards, it would appear discriminatory to single out a particular type of accommodation (converted buildings) and apply restrictions that do not pertain to other forms of housing that essentially serve the same function. And, third, the minimum floor area requirements that are contained in the Zoning By-law in some cases are excessive and effectively rule out the possibility that accommodation in converted buildings will be affordable for lower income smaller households. In the case of dwelling rooms in converted buildings, the zoning provisions are

less than the O.B.C. space requirements and are essentially superfluous. In the case of dwelling units in converted buildings, the opposite is true and the zoning standards form a major impediment to conversion.

A recent report commissioned by the Ministry of Municipal Affairs and Housing concurs with the Task Force in this criticism of zoning requirements respecting minimum room sizes. It asserts that zoning provisions of this kind attempt to pre-select the market to which converted units may cater, thus ensuring that they will attract more affluent tenants and larger households, especially families. The report concludes that "size does not guarantee quality, rent levels, or even that a unit will be occupied by a family rather than a number of single people sharing .... unit size should not be used in an attempt to control the quality or market served by converted units, which should instead be left to the Ontario Building Code."

Since the Affordable Housing Task Force last reported, Part 11 of the O.B.C. has come into effect. This part of the O.B.C. specifically applies to renovated buildings and provides "compliance alternatives" to many of the O.B.C. standards for new construction. In the case of the minimum space and dimension requirements contained in Part 9 of the O.B.C. (which applies to smaller residential buildings), standards are waived altogether for renovated or converted structures that are at least five years old. For converted houseform buildings, therefore, the combined effects of Part 11 of the O.B.C. and the recommendations of the Task Force will be that only the provisions of the Housing By-law will apply to prevent overcrowding. Following the principle cited earlier that there should be consistent standards applying equally to conversions and new construction, I am of the view that the O.B.C. Part 9 minimum space requirements that apply to dwelling rooms and dwelling units under new construction should also apply to converted buildings. Introducing these standards into the Zoning By-law will not result in redundancy or administrative overlap in this instance because of their prior deletion from the O.B.C.

5. THE CASE OF NORTH PARKDALE

Three of the four deputants who spoke in opposition to the Affordable Housing Task Force recommendations at the 12 December 1984 Land Use Committee meeting reside in Ward 2. It was suggested, among other things, that Ward 2 north of Queen Street is a special area that may be particularly vulnerable to intensification pressures. It was argued that, due to its unique nature and its proximity to South Parkdale, this neighbourhood should be given the same exemption from the Task Force recommendations as is the case for South Parkdale. Your Committee

recommended that one of the paragraphs contained in the City Solicitor's draft by-law be amended to include the area north of Queen Street to Howard Park Avenue and Dundas Street, between Parkside Drive and the C.N.R. tracks.

If the intent of your Committee's amendment is to provide North Parkdale with an exemption similar to that which applies to South Parkdale, then the noted change is not adequate. Most of the special restrictions that apply to South Parkdale are contained in Sections 16(2)(xxxx), (eeeee) and (fffff) of the Zoning By-law and will continue to be in effect. The new clause recommended in the City Solicitor's draft by-law is limited to ensuring that South Parkdale is also a prohibited area for apartment houses containing dwelling rooms (as newly defined). If your Committee wishes North Parkdale to share all of the prohibitions that are in force in South Parkdale, then you should request from the City Solicitor draft legislation that amends all of the appropriate clauses of Section 16(2).

I am of the view, however, that it is not advisable to make special zoning exception for other parts of Ward 2 outside of South Parkdale. My staff have met with the president of the Roncesvalles Macdonell Residents' Association (who was a deputant at your Committee's 12 December 1984 meeting) and discussed in detail the case of North Parkdale. Upon her suggestion, staff agreed to analyze specific population and housing data for certain areas in Ward 2 in order to determine whether or not these represent uniquely vulnerable neighbourhoods for the purposes of the Affordable Housing Task Force recommendations. The results of this analysis follows.

Table 1 below indicates housing occupancy trends for the period 1978 to 1983 in the City of Toronto and parts of Ward 2. The year 1978 was considered a watershed year because this marks the enforcement of the first bachelorette by-laws.

Some Ward 2 residents have asserted that there is an established trend of intensification in their neighbourhoods. They feel that conversions are on the rise, that the number of rooming houses is increasing and the tenant population is growing. The figures do not bear this out for Ward 2 north of Queen Street. As Table 1 indicates, there was actually a drop in the total number of units in North Parkdale by 4.0% in the 1978-83 period. This represents less intensive use of existing properties. Furthermore, there has been a shift in the tenure mix. While the number of ownership units has had a modest increase (+5.9%), units in mixed owner-tenant buildings have dramatically decreased in number by 17.0%. This tenure category typically comprises converted houseform buildings. The number of rental units in tenant-only properties has remained virtually unchanged.

TABLE 1: CHANGES IN HOUSING OCCUPANCY 1978-83 FOR THE CITY OF TORONTO AND WARD 2 NEIGHBOURHOODS

Tenure Changes Among Existing Properties	CITY OF TORONTO	SOUTH PARKDALE	NORTH PARKDALE	DUFFERIN
Properties in 1978				
- all properties	109,509	1,219	4,532	2,226
- ownership	67,399	385	2,219	1,381
- owner-tenant	16,262	229	1,264	491
- rental	21,980	539	937	305
- vacant	3,868	66	112	49
Properties in 1983 (%Change)				
- all properties	109,509 (-)	1,219 (-)	4,532 (-)	2,226 (-)
- ownership	70,399 (+4.4%)	425 (+10.4%)	2,385 (+7.5%)	1,444 (+4.6%)
- owner-tenant	12,703 (-21.9%)	215 (-6.1%)	1,078 (-14.7%)	414 (-15.7%)
- rental	22,959 (+4.4%)	525 (-2.6%)	967 (+3.2%)	337 (+10.5%)
- vacant	3,448 (-10.8%)	54 (-18.2%)	102 (-8.9%)	31 (-36.7%)
Units in 1978				
- all units	241,280	9,795	10,005	3,339
- ownership	73,346	472	2,592	1,583
- owner-tenant	38,516	664	3,202	1,061
- rental	124,108	8,425	4,014	639
- vacant	5,310	234	197	56
Units in 1983 (% Change)				
- all units	235,563 (-2.4%)	9,503 (-3.0%)	9,608 (-4.0%)	3,333 (-)
- ownership	76,410 (+4.2%)	515 (+9.1%)	2,746 (+5.9%)	1,708 (+7.9%)
- owner-tenant	31,428 (-18.4%)	753 (+13.4%)	2,657 (-17.0%)	903 (-14.9%)
- rental	123,019 (-0.1%)	8,067 (-4.2%)	4,035 (+0.6%)	683 (6.9%)
- vacant	4,706 (-11.4%)	168 (-28.2%)	170 (-13.7%)	39 (30.4%)

NOTE: SOUTH PARKDALE = WARD 2 South of Queen Street NORTH PARKDALE = WARD 2 North of Queen St. and west of CNR tracks
DUFFERIN = WARD 2 East of the CNR tracks

SOURCE: Provincial Assessment as processed by the Housing Occupancy Analysis System

When these figures are compared to the City figures, it is apparent that North Parkdale reflects well the average Toronto situation with respect to conversion activity and the attendant changes in occupancy.

In discussing these findings with the representative of the Roncesvalles Macdonell Residents' Association, planning staff were advised that the North Parkdale study area should be refined further. I have now analysed data for the smaller area specified by the residents' group: Queen Street north to Fern and Rideau Avenues, between Roncesvalles Avenue and the CNR tracks. The results remain essentially the same. Within the area identified by the residents' group, there was a loss in total of 83 units during the study period, representing a 1.7% decrease. There was a shift in tenure types that saw ownership units increasing in number by 172 (a 21.0% rise), at the expense of units in mixed owner-tenant buildings that declined by 284 (a 26.6% drop). Rental units in tenant only buildings remained virtually unchanged in number (0.5% increase).

I have also analysed the population characteristics of the neighbourhood identified by the residents' group. It was suggested by the residents that this area is characterized by an inordinate number of single persons, fewer families and more crowding. Again, these statements are not borne out by the data.

Table 2 below compares selected population characteristics of North Parkdale and the City of Toronto. In terms of crowding, there were 2,336 fewer people residing in North Parkdale in 1981 than 5 years previous, representing a trend of depopulation that significantly exceeds the City's rate of population loss. The North Parkdale figures for average household size, proportion of family persons, number of persons per family and number of children per family are reasonably close to the City's figures.

The brief presented by the Roncesvales Macdonell Residents' Association contained statistics that demonstrated an unusually high concentration of rooming houses in Ward 2. Upon examination of the detailed figures provided by the residents' group, it was determined that two-thirds of these properties are located in South Parkdale. It is interesting to note that while there are 33 licensed rooming houses in Ward 2 north of Queen Street, 31 other former rooming house properties in the area have had their occupancy reduced since licensing procedures began in 1975.

TABLE 2: POPULATION CHARACTERISTICS OF NORTH PARKDALE AND THE CITY OF TORONTO, 1981

	CENSUS TRACT NOS.					Total North Parkdale	City of Toronto
	47	48	49	51	52		
Population 1976	8,082	4,208	4,097	6,420	4,487	27,294	633,318
Population 1981	7,857	3,711	3,748	5,618	4,024	24,958	599,217
% Change	-2.8%	-11.8%	-8.5%	-12.5%	-10.3%	-8.6%	-5.4%
No. Households	2,840	1,460	1,580	2,205	1,410	9,495	241,275
Population in private households	7,815	3,670	3,485	5,555	4,000	24,525	582,710
Average Household size	2.75	2.51	2.21	2.52	2.84	2.58	2.42
Total Families in private households	1,885	885	795	1,220	970	5,755	135,955
Family persons in private households	5,885	2,605	2,235	3,345	2,985	17,055	416,170
No. of children at home	2,385	965	760	1,080	1,205	6,395	164,550
% Family persons to total persons	75.3%	71.0%	64.1%	60.2%	74.6%	69.5%	71.4%
Persons per family	3.12	2.94	2.81	2.74	3.08	2.96	3.06
Children per family	1.26	1.09	0.96	0.89	1.24	1.11	1.21

SOURCE: CANADA CENSUS

In summary, if your Committee intends to exempt North Parkdale from the Affordable Housing Task Force recommendations, then the amendment made to the City Solicitor's draft by-law is inadequate. All the planning evidence I have analysed suggests that North Parkdale is not a vulnerable area and I recommend that no exemption is made.

6. OTHER ISSUES

Residents have voiced a number of other concerns related to the Affordable Housing Task Force recommendations. As mentioned earlier, the majority of objections received to date have come from neighbourhoods that will only be marginally affected by the zoning reforms, if at all.

Some opposition has been raised against allowing boarding or lodging houses in R1A districts. I would like to make the following points:

- the new proposed definition of boarding or lodging house stipulates that the building must be originally constructed for this purpose; there is presently only one property in the City of Toronto of which I am aware that would meet this definition; this one example was built with heavy senior government subsidies and any additional examples constructed in the future will be extremely limited in number due to the level of required subsidization;

- R1A districts are very limited in extent, occurring in isolated pockets in the west end, the Beaches and parts of North Toronto; and

- R1A districts typically have a Z2 density designation which puts strict limits on the size of any new boarding or lodging house that may be constructed.

At a more general level, some residents appear concerned that the zoning reforms being recommended by the Task Force will result in a plethora of small, substandard rooms and units that will attract a large influx of low income single people to their neighbourhoods. It is perceived that this will threaten the stability of established communities and cause a loss in family accommodation. The experiences of a number of other North American jurisdictions and the outcome of recent research conducted among Ontario municipalities demonstrate that these fears are unfounded.

Case study after case study in Canada and the United States indicate that zoning changes aimed at facilitating conversions at best result in modest increases in renovation activity. A nation

wide survey conducted by American planner Patrick Hare proved that current financial and housing market conditions were much more significant factors in stimulating conversions. Invariably, whenever municipalities soften their zoning regulations, most new permit applications are for the legalization of existing converted dwellings. However, legalization is nonetheless important because it ensures that converted buildings are brought up to the standards of the building code and encourages homeowners, other than those willing to disregard the law, to convert underutilized housing. (see PAS Report No. 365, "Accessory Apartments: Using the Surplus Space in Single Family Homes", published by the American Planning Association). Canadian experiences have been similar. For example, since Vancouver changed its land use regulations over eight years ago to permit conversions, only a trickle of new applications have been received.

Research in Ontario clearly demonstrates that the same response to zoning reform will likely occur in Toronto. The Province has just completed an evaluation of its pilot programme "Add-a-Unit", which provided loan assistance to property owners intending to create additional units in their homes. Despite financial aid, take up of the programme was extremely limited. Indeed, provincially sponsored surveys have shown that at most only about 12% of property owners would even consider conversion.

Even if conversion activity is limited, fears remain that those properties that are renovated will accommodate new tenants who are socially incompatible with the surrounding community. Again, recent research in Ontario indicates this generally has not been the case and is unlikely to occur in the future. A consultant's report commissioned by the Ministry of Municipal Affairs and Housing reviewed an extensive body of Ontario research and concluded that, "existing communities are likely to find that the majority of tenants in conversions share the values, lifestyle and concerns of most homeowners and will have an interest in maintaining life much as it is .... the process of neighbourhood intensification will not cause a social disruption of neighbourhood life. It is just as likely that the new tenant residents will add to the vitality of neighbourhood life" (see Frank R. Lewinberg, <u>In Your Neighbourhood</u>).

It should be noted that those Toronto neighbourhoods that have experienced physical and social disruption due to past intensification abuses (specifically, South Parkdale and the Annex) were victims of excessive developments that in most cases were illegal under the old zoning provisions (as well as the O.B.C. and Housing By-law) and will continue to be illegal. In any event, more restrictive zoning regulations will remain in place in these areas. The important conclusion to be drawn from these experiences is that enforcement of existing standards is

really the critical consideration, not the creation of new and more onerous restrictions. Your Committee has requested the Commissioner of Buildings and Inspections to report on these enforcement matters.

There is little cause for concern that conversion activity will reduce the supply of family housing. At the moment, there are about 172,000 dwelling units in Toronto that meet the City's criteria of housing suitable for families with children (i.e. contain two or more bedrooms and have direct access to grade). There are only 85,000 families with children who currently reside in Toronto, however. This is not to say that Toronto families do not experience housing difficulties. The problem is not housing supply per se, but affordability: low income families can not compete in the local market with higher income families and non-family households. More intensive use of existing properties will not affect this situation one way or the other.

The present reality of Toronto's demography is that the City is no longer mostly composed of family households. Almost two-thirds of Toronto households (64.8%) contain only one or two persons. These households exhibit the full range of social and economic characteristics. Some are high income professionals working in downtown executive offices and living in luxury condominiums. Others are homeless transients who are unemployed. What they share is a need for accommodation. Despite the profound shift in the population toward smaller households, the majority of Toronto's housing stock is physically designed for families. Moreover, the Zoning By-law currently discourages the creation of smaller units, both under new construction and through renovation. The primary thrust of the Affordable Housing Task Force recommendations is to allow the regulatory flexibility necessary for the existing building stock to be adapted to meet emerging housing needs.

Surveys have shown that the typical tenant population served by units in converted buildings is composed of singles in their thirties, with somewhat above average incomes, who intend to eventually be homeowners (see Lewinberg, op. cit.). Easing the zoning restrictions will hopefully facilitate the creation of more units for this target population. Small units in converted buildings or shared accommodation in new or renovated buildings may also serve the housing needs of low income smaller households if assistance programmes are in place. Senior governments have demonstrated an interest in sponsoring these types of housing programmes. Easing the zoning restrictions will allow Cityhome and non-profit groups such as the Homes First Society, the Christian Resource Centre and Ecuhome to take advantage of existing and future government assistance. Given the limited

scale of these programmes, this will result in important but small additions to the City's stock of affordable housing.

7. CONCLUSION

Your Committee requested that I coordinate a response to the submissions received regarding the work of the Affordable Housing Task Force. This report recommends that any strengthening of the requirements to provide sanitary facilities be implemented through changes to the Housing By-law. It also recommends that the Zoning By-law contain minimum floor area requirements for converted housing in order that all housing, whether newly constructed or renovated, be subjected to the same space standards. The report also concludes that North Parkdale should not be treated differently with respect to zoning regulations that affect conversion. Finally, this report demonstrates that the zoning reforms recommended by the Task Force will likely result in only modest construction and conversion activity. Having legalized these developments, the housing so created should now meet the required health and safety standards of the O.B.C. and Housing By-law. This will allow underutilized building stock to be used to accommodate Toronto's growing small household population. To the extent that senior government assistance programmes are in effect, a proportion of this housing will be affordable for lower income singles and couples.

RECOMMENDATIONS:

1. That the draft by-law contained in the City Solicitor's 5 October 1984 report to your Committee be amended in order to effect the following amendments to Zoning By-law 20623:

   1.1 Under the new proposed paragraph (j) of Section 8(1), add new clauses (vi) and (vii), as follows:

   "(vi) no dwelling room shall be used for dwelling accommodation unless it has a floor area of at least 17.7 square metres, such floor area to include the space of interior walls and partitions;

   (vii) no dwelling unit shall be used for dwelling accommodation unless it has a floor area of at least 24.9 square metres, such floor area to include the space of interior walls and partitions."

   1.2 Under the new proposed paragraph (k) of Section 8(1), add a new clause (iii), as follows:

"(iii) no dwelling unit shall be used for dwelling accommodation unless it has a floor area of at least 24.9 square metres, such floor area to include the space of interior walls and partitions."

2. That the draft by-law contained in the City Solicitor's 5 October 1984 report to your Committee be amended in order to effect the following amendments to By-law 291-68:

2.1 Under the new proposed paragraph (i) of Section 8(1), add new clauses (vi) and (vii), as follows:

"(vi) no dwelling room shall be used for dwelling accommodation unless it has a floor area of at least 17.7 square metres, such floor area to include the space of interior walls and partitions,

(vii) no dwelling unit shall be used for dwelling accommodation unless it has a floor area of at least 24.9 square metres, such floor area to include the space of interior walls and partitions."

2.2 Under the new proposed paragraph (j) of Section 8(1), add a new clause (iii), as follows:

"(iii) no dwelling unit shall be used for dwelling accommodation unless it has a floor area of at least 24.9 square metres, such floor area to include the space of interior walls and partitions."

3. That the draft by-law contained in the City Solicitor's 5 October 1984 report to your Committee be amended in order to effect the following amendments to By-law 278-73:

3.1 Under the new proposed paragraph (i) of Section 9(1), add new clauses (vi) and (vii), as follows:

"(vi) no dwelling room shall be used for dwelling accommodation unless it has a floor area of at least 17.7 square metres, such floor area to include the space of interior walls and partitions,

(vii) no dwelling unit shall be used for dwelling accommodation unless it has a floor area of at least 24.9 square metres, such floor area to

include the space of interior walls and partitions."

3.2 Under the new proposed paragraph (j) of Section 9(1), add new clause (iii), as follows:

"(iii) no dwelling unit shall be used for dwelling accommodation unless it has a floor area of at least 24.9 square metres, such floor area to include the space of interior walls and partitions."

4. That the Commissioner of Planning and Development, in consultation with other appropriate City officials, report to the Neighbourhoods Committee on revised standards to be included in the Housing By-law to regulate the provision of sanitary facilities in dwellings, and that this request be forwarded to the Neighbourhoods Committee for its information.

5. That your Committee's 12 December 1984 decision to amend that section of the draft by-law contained in the City Solicitor's 5 October 1984 report dealing with South Parkdale be rescinded.

6. That my 1 November 1984 report and the City Solictior's 5 October 1984 report and draft by-laws, as amended by the foregoing recommendations, be approved.

Stephen G. McLaughlin
Commissioner

DA/if

POOR
QUALITY
ORIGINAL